

Water Pollution Control Advisory Council (WPCAC) Meeting  
March 1, 2007 10:00 a.m. – 1:45 p.m.  
Director's Conference Room 111 Metcalf Building

Call to Order

Chairman Terry McLaughlin called the Water Pollution Control Advisory Council meeting to order on March 1, 2007 at 10:00 a.m.

Roll Call

Terry McLaughlin had everyone introduce themselves, the effect being that the council members in attendance knew who the alternates were.

Council Members Present: Terry McLaughlin (Chair), Earl Salley, Karen Bucklin Sanchez, Roger Muggli, Jon Bengochea, Stevie Neuman, Shirley Layne (alternate), Tina Bernd-Cohen (alternate), Don Skaar, and Michael Wendland.

A quorum is present.

Department of Environmental Quality (DEQ) Personnel Present: Bob Bukantis (Council Secretary) Water Quality Planning Bureau (WQPB), Planning, Prevention and Assistance Division (PPAD); Bonnie Lovelace Water Protection Bureau (WPB) Permitting and Compliance Division (PCD); Christian Levine, WQPB, PPAD; Michael Suplee, WQPB, PPAD; Claudia Massman, Legal; John North, Legal Unit; Angie Hayden, (Administrative Support) WQPB, PPAD.

Approval of Agenda

Terry McLaughlin asked for additions or changes to the [agenda](#).

Terry McLaughlin would like to, add to the agenda, the selection of the vice chairperson in addition to selection of the chairperson.

A motion to approve the agenda was made and seconded. The motion carried and the agenda was approved as written with the addition.

Briefing/Update Items

**Legislative Update:**

Bob Bukantis handed out a sheet which had a summary of legislative bills that the DEQ asked to have brought before this year's legislature. The written summary was put together by DEQ's public information officer.

John North gave a summary of legislative action pertaining to the Montana Administrative Procedure Act (MAPA), which is the statute that provides the procedures that the Board and the Department have to use to adopt rules. There is a lot of activity on this topic in this year's legislative session. Some of this action was driven by the legislature's response to the Public Employee Retirement Board allegedly doing some rulemaking without complying with the bill sponsor notification procedures in MAPA and by implementing rules before they became effective. Between those two things, there was a real flurry of activity this session.

The first category of bills that John North talked about is bills dealing with review of agency rulemaking by the Legislature or the Governor..

HB97: Sponsored by Representative Barrett. This bill affects the process of rulemaking by agencies. Under the process as it stands right now, the agency prepares the rule and prepares a

notice, and gives it to the Secretary of State. The Secretary of State then publishes it in the State equivalent of the Federal Register (Montana Administrative Register) and also mails it to different people on the mailing list. There's a comment period during which a hearing is usually held. At the close of the comment period, the agency compiles the comments, prepares a notice of adoption, and then publishes the notice of adoption in the Montana Administrative Register. The rules are considered adopted at the time the notice appears in the Register. The rules become effective the day after the notice appears in the Register. This bill would say that 60 days before an agency publishes the first notice (notice of proposed rulemaking), we have to submit the proposed rule to a new office that's being created in this session of the legislature called something to the effect of the Office of Rule Review. This office will be composed of 4 fulltime employees, 2 of which are attorneys who will review the notice and determine if the agency actually has authority to adopt that rule. They will make this determination and then report to whatever legislative committee that's assigned oversight for that particular agency. For DEQ, it's the Environmental Quality Council which is an interim committee of the legislature. Under existing law, if the committee thinks that the agency does not have authority to adopt a proposed rule, the committee must first give the agency notice of such. If the agency adopts the rule anyway, there are a number of procedures that could delay the adoption or effective date of the rule made. In addition, this new office is also being given the task over a four year period to review all rules an agency has adopted and make the same determination of each of these rules. The bill sunsets after four years. The bill is written under the presumption that, if the Office of Rule Review notifies the agency that a rule was not within the scope of DEQ's authority to adopt, DEQ would repeal it. If it did not, the Office would report to the next legislature and the legislature would repeal it.

SB340 – An agency under the Governor, which includes DEQ and also the Board of Environmental Review (BER), would have to give the Governor notice of all proposed adoption of rules. The Governor would have the authority to object to the rule. If he does, the agency would have to publish a notice that the rulemaking had been withdrawn and thus could not do similar rule making within the year. The bill died in the Senate.

SB176 – When an agency adopts a rule and that rule is struck down by the court that for the reason that the rule is not in the authority of the agency to make, the Department of Administration would then have to determine if the agency intentionally adopted a rule that it knew was not in its authority to adopt. If that determination is made, the agency would have to pay for the other side's attorney fees. The money would come out of the agency's existing budget. The agency couldn't go for a supplemental appropriation. The bill died in the Senate.

SB7 – This bill provides that the Environmental Quality Council could nullify any rule by a majority vote. This bill is unconstitutional. The bill sponsor said he would bring it back if he could find a way to make it constitutional. He never did. The bill is dead.

SB408 – Requires agencies to send any proposed bills to the Governor's Office for review. This is already being done and would be redundant so this bill died.

Another category of bills deals with an agency's adoption authority.

HB209 – This bill would modify the criteria that an agency looks at to determine whether or not to adopt a rule. Right now the rule states that an agency can adopt a rule if it's reasonably necessary to advance the purpose of the agency's statute. The concept of reasonable necessity is an established legal term. Public Case law defines it as, NOT that the adoption rule is absolutely necessary, but rather that it's a reasonable way of protecting environmental quality. It's a reasonable rule and it advances the purposes of the statute being implemented. HB209 would

remove “reasonably”. In other words, the bill may require that an agency would have to find that adoption of the rule is absolutely necessary to advance the purposes of the statute. This bill is still alive in Senate.

HB254 – This bill amends the definition of “rule” in the Administrative Procedures Act. If the agency is adopting something that comes within the definition of rule, the agency then has to go through the rulemaking procedure noted earlier. Right now rule is defined as statements of policy or general applicability that prescribe law or policy. HB254 removes the component that includes the word “policy”. That means that agencies would be able to adopt policies that don’t constitute law but do affect how the agency deals with the public and will not be required to go through the Administrative Procedures Act. Thus the agency could adopt a policy without public notice and without public comment, and it essentially will remove the ability to sue the agency over a policy. Stevie Neuman asked who the sponsor is and John North answered that he thinks it’s Representative Stoker.

HB276 – Under the Administrative Procedures Act, an agency can propose the adoption of a rule on its own initiative. There’s also a process for the public to petition the agency to initiate a rule. As it stands right now, the agency accepts the petition and has 60 days to grant or deny the petition and must give its reasons for the decision. If it grants the petition, the agency goes forward with the rulemaking process. HB276 would amend this in regards to the BER only. It would say that BER could not accept (would have to deny) a petition if the petition is substantially similar to a piece of failed legislation from the previous session. Terry McLaughlin asked who would make that determination of “substantially similar”. John North answered that the bill specifically states that the Director of DEQ will make that determination. The Board subsequently would be bound by the Director’s decision. Shirley Layne wanted to know the time constraints of bringing the issue up. John North thinks this restriction would be placed on just the 2 years following that legislative session. This is still alive in the Senate.

The last category of bills is those dealing with the bill sponsor notification requirement.

SB71 – When an agency begins to draft rules to implement a new statute, it must notify the primary bill sponsor so the sponsor can have some input on how the rules are drafted. Then when the agency issues its notice of proposed rule making, it must send the notice also to the sponsor. The agency is required to indicate in the rule notice whether or not the bill sponsor requirements apply, and whether they’ve been complied with. This bill requires that an agency also state how the bill sponsor notification requirement was complied with (dates, who, etc). If the agency doesn’t provide this, the rule would be deemed invalid.

Terry McLaughlin asked if there are any questions for John North. Earl Salley asked if four years will be enough time regarding HB97. John North answered that for two attorneys and that being their only job, the assumption is yes. Jon Bengochea asked what will happen after the four years. John North said that we would probably revert back to the old process. The idea is all rules would have been reviewed by the end of the four years and after that the existing rule committees would only have to review the new ones.

### **Update of the Status of Numeric Nutrient Criteria Development:**

Mike Suplee started by pointing out that he had presented to WPCAC before in 2001. That presentation was mostly outlining what DEQ had been planning to do. This presentation told the council where the DEQ is at and addresses some new issues that arose along the way. Please reference the [PowerPoint Presentation](#).

Slide 13 needed some extra explanation. Mike Suplee went into detail: The y axis represents the oxygen requirement index (ORI) and is determined by diatoms. The x-axis represents total nitrogen (TN) concentration measured in the streams. The opposite “y” axis on the right side of the chart represents diatom inferred dissolved oxygen (DO). As TN in the streams goes up, we see the diatom index also goes up, meaning the DO concentrations have declined. Using the Diatom ORI, you can infer what the DO in the stream was when the diatoms were growing. There’s a change point as you move from left to right across the figure. There’s a point where the scatter seems to drop down quite a bit. There has been statistical analysis of this and there is a significant change. There’s also a significant relationship between these two variables (ORI correlated to TN). The yellow dots are reference sites (these are minimally impacted sites for all uses). They are used to “anchor our expectations.” The top of the red arrow shows where the ORI has dropped (from 2.7-3.00). It falls right across the break point where most of our standards exist for DO for that region of the state. If you wanted to protect most streams in the region most of the time, you would set it right at this change point. Beyond that you’re going to have too low DO most of the time. So looking at this scatter chart, we would put it at 1.2 mg/l.

Slides 14 and 15 summarize the public opinion survey. This was done both on stream and by random mail surveys of registered Montana voters. We showed them a series of photographs (8) of different streams with different levels of algae density and asked if each was desirable relative to their recreational use of rivers and streams. Slide 15 shows the results of this study. Don Skarr asked what the algae levels were on the pictures shown earlier on slide 3. Mike Suplee answered that the one on the left (Clark Fork) was either the 404 or the 299. The one on the right was not actually measured, but from Mike’s experience, it was past that 150 threshold.

Karen Sanchez asked if the numbers on slide 16 would apply to larger streams as well, for example the Yellowstone or Missouri. Mike Suplee said we are actually still working on the Yellowstone and the Missouri specifically. The ecoregion approach works well for small, wadeable streams because there are a lot of them that you can carry out studies on. The large rivers are “unique”; meaning there’s only ONE Yellowstone, there’s only ONE Missouri. There aren’t replicates and/or duplicates that we can go out and measure to compare. There is a slightly different approach with the large rivers. We are attempting to use a very highly refined water quality model. In the model, you can set algae levels and DO levels and adjust the nutrients until you keep them at those appropriate levels. Karen Sanchez wants to know regarding municipal waste water if Mike Suplee has any idea what the levels will be for larger streams. Mike Suplee’s best guess is that the Yellowstone won’t have numbers that aren’t extremely different than these numbers on slide 16. Karen Sanchez asked where the ecoregions that were referenced earlier in the presentation are located. Mike Suplee said they are artificial creations (maps). They overlayed different mapping layers such as a geology layer, a plant layer, a soil layer, etc and after they are overlayed, they then look for general areas of similarity.

Terry McLaughlin asked if BNR (Biological Nutrient Removal) was post secondary treatment? Mike Suplee answered yes. Jon Bengochea asked what triggered the cause for the need of a mechanical plant as opposed to a lagoon-ammonia? Mike Suplee said that because of the age of the system, they were close to being out of compliance. Also we tried to estimate future criteria so that they (Philipsburg) could look at building something now to meet not only the minimum requirements but also any that may need to be met as a result of a rule change in a few years. Jon Bengochea asked if the mechanical plant, which is more expensive than a lagoon, is needed in order to perhaps meet the more strict criteria we might face in the future. Mike

Suplee confirmed that these criteria are not in rule yet. But it's a "risk management" decision. We have a rough idea of what some of these criteria are going to look like in the near future. We can't just implement them right now and say "Good luck". We are trying to work on an implementation policy associated with the science-based criteria that will work. Terry McLaughlin wanted to know if the \$6.2 million BNR was based on the 0.05 (Total Phosphorus) and 0.3 (TN) criteria. Mike Suplee said it was based on slightly higher criteria. It looked like Georgetown Lake had effects on the water quality locally that were natural. They weren't quite that low but they were still low.

Mike Suplee extended an invitation to WPCAC for any of the members to sit on this committee to determine "how expensive it too expensive?" (slide 20).

Karen Sanchez asked (regarding slide 20) if DEQ will take into consideration the population rise as it did for the projected rise in criteria in regards to the cost per household. Mike Suplee said he's not real familiar with that part. His understanding is that they use current available information. Essentially, it's a snapshot of the community as it exists today. None of these screening criteria were run on Philipsburg. So Mike does not know where they fall in that 1 to 2 to greater than 2% rate points. His guess would be in the greater than 2% range. Karen Sanchez asked that if there are artificially low existing rates the percent will more than likely be greater than 2. Mike Suplee said it's based on household income, not on current rates. All municipalities would be looking at is how much people earn and how many there are relative to the upcoming costs that would occur by building this new system. Thus, this will impact the small and medium sized communities more than the larger ones as there are less people to help burden the cost. These smaller communities are the focus of our cost analysis at this point.

Tina Bernd-Cohen asked what the difference is in point source versus nonpoint source nutrients and how this ties into the Total Maximum Daily Load (TMDL) nutrient loading modeling methods that are being used. Mike said that when these criteria become rule, the TMDLs would have to meet those criteria. When point sources were in the watershed then they would have to receive allocations in the TMDL and presumably they would get the nonpoint and the point sources equitably balanced out and everyone would reduce their share to meet the standard.

Michael Wendland asked when they are going to set the criteria on larger rivers (Yellowstone). Mike Suplee responded that we are using the modeling approach referenced earlier. If this approach is successful, that would be the way the numbers are derived. They start looking at load allocations, etc in the long term when the TMDL will be implemented.

Roger Muggli asked what the light sensitivity or the clarity of the water has to do with algae growth? Mike Suplee said that the prairie streams have a higher nitrogen level than the Clark Fork, for example. Part of it is that Western Montana has very clear water and very low nutrients so it doesn't take much to get that growth.

Jon Bengochea asked about a timeline on the "how expensive is too expensive?" committee. Mike Suplee informed the Council that there is a contract in place to gather current costs and available wastewater treatment technologies for communities that have 3,000 people or less. We target that because we figure those communities will have the most impact. There is a consultant working on that now. In a couple of months, after that comes back, we will do an "in-house" analysis and at that point (several months from now) we may have enough to start to gather the committee together.

### Approval of Minutes for November 2, 2006 Council Meeting

Terry McLaughlin asked for any corrections or edits to the [November 2, 2006 meeting minutes](#).

Stevie Neuman points out 3 typographical errors that needed to be fixed:

- Page 3; “DEQ’s comments in draft from” (should be form)
- Page 3; “sent out BER” should read “sent out to BER”.
- Page 4; “position at this point to support” should read “is to support”.

A motion to approve the November 2, 2006 minutes with the errors corrected was made and seconded. The motion carried and the November 2, 2006 minutes were approved as written.

### Action Items

#### Selection of New Chairperson

Terry McLaughlin gave a summary on the chairperson’s duties, along with the pros and cons of being the Water Pollution Control Advisory Council’s chairperson. He lobbied that the chairperson is not solely responsible for putting the meeting on. There is a huge asset within the DEQ in the form of Bob Bukantis as he works extremely close with the chairperson in regards to the substance of the meeting. As the chairperson, the primary responsibility is to run the meeting. The chairperson should remain objective and neutral as you oversee these meetings.

Terry McLaughlin opened the floor for any member of the Council to nominate and/or recommend another member for consideration as the new chairperson. Shirley Layne recommended Dude Tyler. No other nominations were put forth.

A nomination for Dude Tyler for chairperson was made and seconded. The motion carried and Dude Tyler is the Chairperson for the Council through the remainder of 2007.

#### Selection of New Vice Chair

Terry McLaughlin said it is important that there is at least one other person who can be charged with running the meeting in the event that the Chairman cannot be there.

A nomination for Terry McLaughlin for Vice Chair was made and seconded. The motion carried and Terry McLaughlin is the Vice Chair for the Council through the remainder of 2007.

### Approval of [2007 WPCAC Calendar](#)

Bob Bukantis stated that the calendar is set up to have each WPCAC meeting approximately four weeks prior to an upcoming Board of Environmental Review (BER) meeting. The reason for this is if the department has a proposed rulemaking, it’s required that it come before this council prior to going before the BER.

Terry McLaughlin opened the floor for any possible changes to the calendar as proposed. Earl Salley asked if 10:00 a.m. is a good time for everyone or maybe another time would work better. Terry McLaughlin said that originally the meetings were scheduled at 9:30 a.m. This posed some problems for those who had to travel great distances. So the start time was moved to 10:00 a.m. and it seems to be working well. Terry McLaughlin asked the Council if this time still works for all. There were no objections to the time.

Stevie Neuman asked if we could move the August 30 meeting. Terry made the recommendation that the meeting is moved to August 22, 2007.

A motion was made to accept the calendar as presented with the August 22, 2007 change. The motion was seconded. The motion carried and the calendar was accepted with the noted change.

#### Gallatin River Outstanding Resource Water (ORW) Designation Update

Bob Bukantis handed out a copy of the [executive summary for the Gallatin ORW rulemaking agenda item](#) from the last BER meeting. The proposed rulemaking was most recently brought before this council in August to designate the Gallatin River from Yellowstone Park to its confluence with Spanish Creek as an ORW. In 2001, a petition was brought before BER to designate the Gallatin as an ORW. In 2002, the Board directed DEQ to do an Environmental Impact Statement (EIS). The EIS was finished in 2007. The rule clarified that DEQ has the authority to regulate any new or increased sources of pollution, including sources with a hydrological connection to the Gallatin. Another part of the rule was to make sure that any new restrictions did not apply to previously permitted sources. The public comment period for this rule closed in November of 2006. Most of the public comment we received was adverse to the designation on the grounds that the restrictions would render most property around Big Sky undevelopable. At the January meeting, BER was scheduled to act on the ORW designation. DEQ's recommendation was to extend the public comment period because of local interest in a compromise where there would be better protection for the Gallatin River while protecting the interests of developers and/or private property owners. The public comment period has been extended by the Board until July 2007. Once BER makes the ORW designation, it must be approved by the state legislature.

Don Skaar asked if DEQ knows any specifics of these discussions. Bob Bukantis answered that there are concerns with the ability to store waste within floodplain areas. They are looking at options such as centralized waste treatment, waste storage, pumping often, etc. Tina Bernd-Cohen asked if there was possibly a new alternative. Bob Bukantis answered that BER probably would not have extended the comment period if there wasn't an opportunity for success. Don Skaar asked if the new alternative would lead to a new public comment period. Chris Levine answered the question to the effect that if the EIS is significantly changed and there is a significant difference a new public comment period would have to happen. But these changes have to come from BER.

Jon Bengochea asked what the role of WPCAC is. The Department responded that the Council had a role in recommending to BER on the proposed rulemaking. Bonnie Lovelace said that if there were a brand new rulemaking it would for sure come before WPCAC.

Tina Bernd-Cohen asked if the objectors were anticipating in this process the rewriting of the EIS. Bob Bukantis said there were deficiencies that came up in the draft and were addressed in the final EIS. Tina Bernd-Cohen said that as a tool for future use in Montana how important it is to be successful in this endeavor. Bob Bukantis said that as far as funding goes, the state pays for the EIS. However, two sessions ago, the Legislature modified the ORW language such that anyone who petitions BER to designate an ORW will be financially responsible for the EIS. Bonnie Lovelace elaborated on the petition process. The petition for an ORW as opposed to a rulemaking petition differs in that if there is another solution, BER **must** address all possible means to get to the same resolution.



### Status of the Fee Rulemaking

Bonnie Lovelace gave the Council a briefing on the Fee Rulemaking. DEQ receives money from permitting fees. Bonnie Lovelace handed out a [pie chart](#) showing how the Water Protection Bureau is funded. The Water Quality Acts says that fees can be collected based on what the Legislature funds, minus other funding (federal, etc.). Whatever is appropriated is what the fees are based on. As it is written, in 2009, the numbers will go negative. A huge backlog (permits that are reapplied for and renewed) exists nationwide. EPA is monitoring this closely. The Water Protection Bureau created new positions to help catch up on this backlog. This is partly what will cause the negative numbers in 2009.

The billing cycle happens right now (toward the end of the Fiscal Year). The bills are sent out and the public has about a month to pay. If the bills are not paid within 90 days, they will be in violation. About the end of the fiscal year, the money is in hand from the regular billing cycle. This carries through most of the year, until the next billing cycle.

A rule will be brought before the Council to increase fees. The rule will not be implemented until 2008, which is the start of Fiscal Year 2009. This should give the public enough time to prepare for the cost increase. Bonnie Lovelace wants to bring this up in front of a stakeholder's group. The Western Environmental Trade Association (WETA), which is on the industrial side of permitting, has asked to be a part of the stakeholder's group. Municipalities will not be left out. Bonnie Lovelace opened up an invitation to any on the Council to sit in on the stakeholders group.

The fees right now have caps. The permitting division took a bill to the Legislature to raise the caps. The bill failed. There are other options. For example, years ago, when the EPA used to make the decisions about funding operations before we had a fee program, it was based on whether permits were "majors" or "minors". Majors as opposed to minors depended on how much flow they had. A major was over a million gallons per day. A minor was under a million gallons per day. This determines on how often they are inspected. One option is to undo these labels. The fee is affected by the flow. Is there a way to figure out the fees fairly so that one group will not be taking a huge hit while the other group is taking a minimal hit? The stakeholder group will be asked for advice on this subject. One main concern is the number of small communities in Montana that are shrinking. The object is **not** to unfairly charge communities like these.

One more update is the EPA has a rule out for comment. It's about forcing states to have fees. Montana has fees so this will not affect us as much as states without fees. It could in the long run affect Montana if they complete this rule and then get particular about what fee rules look like. Stevie Neuman asked what the progress is on this rulemaking as of right now. There are states that want to put a rider on a bill to stop the EPA from making this particular rule.

The other proposal that **will** be presented to WPCAC is regarding a subgroup that meets more often than WPCAC. It would be a working group. That's something that WETA would be interested in being a part of. Bonnie Lovelace invited anyone on the Water Pollution Control Advisory Council to be a part of this subgroup.

Jon Bengochea asked how much money the bill that Bonnie Lovelace proposed to the Legislature would generate. Bonnie Lovelace said that the bill would have taken the current caps that are set on both annual fees (\$5,000) and the application fees (\$3,000) and raised them by \$2,000 each. The bill failed. The goal is to make this raise in fees as predictable as possible for everybody involved. The goal is not to have a whole bunch of money that's just sitting there.



Terry McLaughlin asked when Bonnie Lovelace was going to bring this in front of WPCAC as part of the rulemaking process. Bonnie Lovelace said that it will hopefully be the next meeting.

#### Coal Bed Methane Issues Briefing

Roger Muggli started by calling attention to the current event of issues with having sodic soil (sodic advance) on some of the crop fields in Eastern Montana. Roger Muggli works for the Tongue and Yellowstone Irrigation District (T&Y). [Photos](#) were presented highlighting the effects of sodic advance in the montmorillonitic clay soils in the eastern portion of Montana. Roger also presented a [salinity report](#) from the United States Department of Agriculture's Salinity Lab in Riverside, California. The conclusion of the study was that on soil of this nature which is 54% montmorillonite clay, damages will start to be noticed at 2 to 4 Sodium Adsorption Ratio (SAR). The Environmental Impact Statement (EIS) did not address sodic conditions on clay. More specifically, "if the SAR is raised above 4% on soil that is more than 50% montmorillonite clay, this is how long you will be able to irrigate the land". Salinity also affects fisheries on the Tongue River. Don Skaar asked what the SAR is for the Tongue River at present. Roger Muggli said it's at 3. Bob Bukantis has an electronic copy of the Salinity Report. If any member of the council is interested in looking at it, please let Bob know. Terry McLaughlin's opinion is that these issues will be before the Council again soon. Bob Bukantis said that there have literally been many hours of this topic before the Council to get to the standards that are now on the books. Bob suggested doing an update on where DEQ is at. DEQ is in the middle of lawsuits because the Coal Bed Methane industry and Wyoming DEQ perceive Montana's standards as being overly protective.

#### General Public Comment on Water Pollution Control Issues

There were no additional comments from the public.

#### Agenda Items for Next Meeting

Agenda items recommended for the next meeting include a presentation on sodium impacts on soils and its relationship to its source in water. Bob suggested doing an update on where DEQ is at. DEQ is in the middle of lawsuits because the CBM industry and Wyoming DEQ perceive Montana's standards as being overly protective. Bob Bukantis said that he could bring the Council up to date on the basic rationale and science behind how the standards were set, including talking about things such as the rainfall effect, etc. Terry McLaughlin asked Bob Bukantis if he would use the Nondegradation slide that explains the different programs in relation to the Standards Section. Another item was a request if we could try to move away from hard copies and go electronic, via email and/or the DEQ website. Stevie Neuman wanted to have a briefing item about severe erosion in the Whitmore Ravine near Great Falls at the next meeting.

#### Adjournment of the Meeting

Terry McLaughlin adjourned the meeting at 1:45 p.m.